



September 27, 2007

Yvette Fox
Health Services Consultant - Rules and Legislative Program
Facilities & Services Licensing
Washington State Department of Health
MS: 7852, PO Box 47852
Olympia WA 98504-7852

Re: Elective PCIs in Hospitals without On-site Cardiac Surgery

Dear Ms. Fox:

Southwest Washington Medical Center (SWMC) recognizes that despite the fact that no national professional society or organization has the data to support offering elective PCI at institutions that do not provide on-site cardiac surgery, many hospitals throughout the US provide this service. We are aware that communities exist with diminished access to Interventional Cardiology and the Washington State House Bill, 2304, is a response to this need.

We ask that rules are written that require a comprehensive needs assessment that demonstrates consideration of the following:

- ◆ Documented evidence of capacity issues that create prolonged waiting times for elective PCI.
- ◆ Lack of service availability for care and management of the uninsured patient
- ◆ Identification of existing programs that will be impacted by introduction of new program and justification for start up.
- ◆ Plans and considerations regarding the impact on existing programs in relation to number of available qualified, experienced technicians and Interventional Cardiologists who meet annual/lifetime PCI volumes and national outcome standards.
- ◆ The estimated impact on an existing program's ability to maintain compliance for volume standards and acceptable levels of outcome performance.
- ◆ Potential impact of new programs on existing program capability to maintain emergency care, door to intervention time of <60-90 minutes

Sincerely,

SWMC Administration – Vancouver, WA